

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 1:23-cv-23004-WPD**

JANE DOE, a minor, by and
through her mother and next
friend, MOTHER DOE,

Plaintiffs,

v.

ACADEMIR CHARTER
SCHOOLS, INC. AND
SUPERIOR CHARTER
SCHOOL SERVICES, INC.

Defendants.

**DEFENDANT ACADEMIR CHARTER SCHOOLS, INC.'S
RULE 26 INITIAL DISCLOSURES**

Defendant, ACADEMIR CHARTER SCHOOLS, INC. (“AcadeMir” or “Defendant”), by and through their undersigned attorneys and pursuant to Federal Rule of Civil Procedure 26(a)(1), hereby serve the following Initial Disclosures in this matter:

PRELIMINARY STATEMENT

This disclosure statement is submitted without waiver of any applicable privilege or protection from disclosure, such as the attorney-client and/or work-product privileges. Defendant reserves the right to object to discovery and/or admissibility at trial of any information contained in or derived from this disclosure statement. Defendant does not concede the relevancy of any information contained in

or derived from this disclosure statement. Defendant reserves the right to rely upon the individuals identified in this disclosure statement for subjects other than those identified herein for any reason, including, but not limited to, responding to Plaintiff or Co-Defendant's disclosures, discovery requests, evidence, and testimony. Defendant reserves the right to supplement these disclosures if and when additional responsive information becomes available.

1. Individuals Likely to Have Discoverable Information:

a. Jane Doe, Plaintiff

c/o Derek Smith Law Group, PLLC
520 Brickell Key Drive, Suite O-301
Miami, FL 33131

Subject: The Plaintiff has discoverable information pertaining to facts and circumstances concerning her educational enrollment and experience at AcadeMir, the damages she is claiming, and other matters that may be used to support Defendant's defenses.

b. Mother Doe and Father Doe

c/o Derek Smith Law Group, PLLC
520 Brickell Key Drive, Suite O-301
Miami, FL 33131

Subject: Mother Doe and Father Doe likely have knowledge regarding Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, any actions taken by Defendants' in response to Plaintiff's claims, and the alleged damages Plaintiff sustained as a result of Defendants' conduct.

c. L.R. and L.R.'s Parents or Legal Guardians

Address currently unknown

Subject: L.R. and his parents or legal guardians likely have knowledge regarding Plaintiff's allegations made in the Complaint and any actions taken by Defendants' in response to Plaintiff's claims.

d. Rolando Mir

c/o Freeman Mathis & Gary, LLP
2502 N. Rocky Point Drive, Suite 550
Tampa, Florida 33607

Subject: Rolando Mir likely has knowledge regarding Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, and any actions taken by Defendants' in response to Plaintiff's claims.

e. **Zoley Castellon**

c/o Freeman Mathis & Gary, LLP
2502 N. Rocky Point Drive, Suite 550
Tampa, Florida 33607

Subject: Zoley Castellon likely has knowledge regarding Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, and any actions taken by Defendants' in response to Plaintiff's claims.

f. **Hira Chaudry**

c/o Freeman Mathis & Gary, LLP
2502 N. Rocky Point Drive, Suite 550
Tampa, Florida 33607

Subject: Hira Chaudry likely has knowledge regarding Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, and any actions taken by Defendants' in response to Plaintiff's claims.

g. **Melissa Valladares**

c/o Freeman Mathis & Gary, LLP
2502 N. Rocky Point Drive, Suite 550
Tampa, Florida 33607

Subject: Melissa Valladares likely has knowledge regarding Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, and any actions taken by Defendants' in response to Plaintiff's claims.

h. **Susie Bello**

c/o Freeman Mathis & Gary, LLP
2502 N. Rocky Point Drive, Suite 550
Tampa, Florida 33607

Subject: Susie Bello likely has knowledge regarding Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, and any actions taken by Defendants' in response to Plaintiff's claims.

i. **Rosemarie Mortazavi**

c/o Freeman Mathis & Gary, LLP
2502 N. Rocky Point Drive, Suite 550
Tampa, Florida 33607

Subject: Rosemarie Mortazavi likely has knowledge regarding Plaintiff's educational enrollment, Plaintiff's allegations made in the

Complaint, and any actions taken by Defendants' in response to Plaintiff's claims.

j. **Stephanie Ruiz**

c/o Freeman Mathis & Gary, LLP
2502 N. Rocky Point Drive, Suite 550
Tampa, Florida 33607

Subject: Stephanie Ruiz likely has knowledge regarding Plaintiff's educational enrollment, Plaintiff's allegations made in the Complaint, and any actions taken by Defendants' in response to Plaintiff's claims.

k. **Miami-Dade Police Department**

Officer N. Almaguer, Baded No. 10193

9105 NW 25th Street
Doral, FL 33172

Subject: The Miami Dade Police Department likely has knowledge of their response to a report made by Mother Doe no or around January 25, 2023, the responding officer's actions and responses to the report, and the incident report generated by the responding officer.

1. All witnesses disclosed by Plaintiff through Rule 26 Disclosures and/or discovery.

m. Defendants reserve the right to supplement or amend these disclosures based on information obtained in the course of discovery or through further factual investigation.

2. Documents, Information, and Things in the Possession, Custody, or Control of Defendant that Defendant May Use to Support Its Defenses

- a. The Miami-Dade School Board's Code of Student Conduct
- b. Miami-Dade Police Department's Offense-Incident Report and Contact/Case Report
- c. AcadeMir Charter Schools Employee Handbook
- d. AcadeMir's Student Case Management Students Services Forms
- e. Amended Charter School Management Agreement between AcadeMir Charter School West and Superior Charter School Services, Inc.

- f. Six surveillance footage tapes depicting Jane Doe's classroom on January 20, 2023.
- g. One surveillance footage tape depicting Mother Doe and Father Doe's meeting with AcadeMir staff on January 24, 2023.
- h. One surveillance footage tape depicting Father Doe's meetings with Academir Staff on January 25, 2023.
- i. All documents identified in Plaintiff and Co-Defendant's Rule 26 Disclosures and any corresponding supplemental disclosures.
- j. Defendant reserves the right to add additional documents, information and things in the possession, custody, or control of Defendants that they may use to support Defendant's defenses based on information obtained in the course of discovery or through further factual investigation.

3. Computation of Claimed Damages and Documents and Evidence on Which Computations are Based:

- a. Not applicable to Defendant.

4. Insurance Agreements Under Which an Insurance Business May Be Liable to Satisfy All or Part of a Possible Judgment in This Action or to Indemnify or Reimburse for Payments Made to Satisfy the Judgment:

- a. Defendant's policy with Gallagher Bassett Insurance, which has been requested through Plaintiff's discovery requests and will be produced (with redacted premiums) in response to those requests.

Dated: November 16, 2023

Respectfully Submitted,

/s/Christopher T. Lawson
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Academir Charter Schools, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served by electronic mail, which furnished same via electronic mail delivery on November 16, 2023, to Kyle T. MacDonald, Esq., Derek Smith Law Group, PLLC, 701 Brickell Avenue, Suite 1310, Miami, FL 33131 (Counsel for Plaintiffs), at Kyle@dereksmithlaw.com; caroline@dereksmithlaw.com; and kylemacdonald@recap.email; and Scott Yount, Esq and Julie McHaffie, Esq., Garrison, Yount, Forte & Mulcahy, LLC, 601 Bayshore Blvd., Suite 800, Tampa, Florida 33606, at syount@garrisonyount.com, jmchaffie@garrisonyount.com, and dtrujillo@garrisonyount.com.

/s/ Christopher T. Lawson
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